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Attorneys for Creditor  
Solectron Corporation

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**RESPONSE OF SOLECTRON CORPORATION TO  
THIRD OMNIBUS OBJECTION TO CLAIMS**

Solectron Corporation, on behalf of itself and its various subsidiaries and affiliates, including Solectron Manufactura de Mexico SA (collectively "Solectron"), responds to the Third Omnibus Objection to Claims (the "Objection"), filed on behalf of Delphi Corporation and certain of its subsidiaries and affiliates (collectively "Delphi") as follows:

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## **I. BACKGROUND**

1. Prior to the commencement of the above-captioned cases, Solectron sold components and products to Delphi on credit terms pursuant to a long-term supply and manufacturing contract.

2. On October 14 and 18, 2005, Solectron made written demand on Delphi for the return of certain components and products delivered to Delphi shortly prior to the commencement of the Chapter 11 cases. Solectron thereafter timely submitted a proof of claim for amounts due Solectron in connection with the supply and manufacturing contract. Solectron's proof of claim was assigned claim number 10914 and asserted a total unsecured claim of \$10,382,335.46 for goods and products delivered under the supply and manufacturing contract, and further asserted that \$2,133,185.60 of that amount was entitled to treatment as a priority claim based on Solectron's reclamation rights.

3. In its Third Omnibus Objection to Claims, Delphi objects to claim no. 10914 and seeks to have Solectron's claim reduced to a general unsecured claim in the amount of \$7,408,798.08.

## **II. RESPONSE TO OBJECTION**

4. Delphi has objected to the dollar amount of claim no. 10914 because the full dollar amount asserted is not reflected on Delphi's books. Representatives of Solectron and Delphi are actively engaged in reconciling their respective records and substantial progress has been made in this effort. Delphi has agreed that pending the completion of the reconciliation, Delphi will modify the relief requested with respect to claim no. 10914 to have the claim modified to a general unsecured claim of \$10,382,335.46. This is without prejudice to Delphi's right hereafter to object to claim no. 10914 on any grounds it deems appropriate. Delphi's counsel has further represented

that the order disposing of the Third Omnibus Objection will provide that it is without prejudice to Solectron's reclamation rights as well as Delphi's right to ///

object to any aspect of such claimed reclamation rights. Based on the foregoing, Solectron has no objection to the relief requested by the Third Omnibus Objection.

Dated: November 20, 2006  
Palo Alto, California

s/Patrick M. Costello  
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